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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

QUANTUM ENERGY, INC.,

Plaintiff,

V.

PCS ADVISORS LLC; and JOHN SUPROCK,

Defendants.

Case No. 2:21-CV-02184-JAD-BNW

Consolidated with
Case No. 2:22-CV-00494-JAD-BNW

**STIPULATION AND PROPOSED
ORDER TO EXTEND DISPOSITIVE
MOTION AND PRE-TRIAL ORDER
DEADLINES**

(THIRD REQUEST)

JOHN L. SUPROCK; LAURIE L. SUPROCK; RENEWABLE ENERGY NOW, LLC; and CONSORTIUM, LLC,

Consolidated Plaintiffs,

v₁

QUANTUM ENERGY, INC.,

Consolidated Defendant.

1 The Parties, Quantum Energy, Inc., John L. Suprock, Laurie L. Suprock, Consortium
 2 LLC, and Renewable Energy Now, LLC, by and through their counsel of record, jointly
 3 move the Court to continue the remaining deadlines for dispositive motions and the joint
 4 pre-trial order by thirty (30) days to permit time for the Court to rule on the motions listed
 5 in the Notice of Matters Ripe for Decision (Doc. 66):

6 (1) Doc. 48 (the Suprock parties' motion to strike Quantum's expert Brenda
 7 Hamilton),
 8 (2) Doc. 49 (the motion to amend the Suprock parties' complaint), and
 9 (3) Doc. 50 (the Suprock parties' motion to supplement or withdraw their
 10 summary judgment motion).
 11 (4) Doc. 54 (Quantum Energy, Inc.'s motion to strike the Suprock parties'
 12 expert), and
 13 (5) Doc. 55 (Quantum Energy, Inc.'s motion to dismiss the Suprock parties'
 14 complaint).

15 (collectively, the "Motions"). The Parties request this extension as the resolution of these
 16 various motions will affect the scope and issues in any dispositive motion briefing.

17 Pursuant to LR IA 6-1, this is the Parties' third joint request to continue discovery
 18 deadlines in the Scheduling Order. Defendant previously moved to extend the deadline for
 19 the close of discovery to January 9, 2023, which extension Magistrate Judge Youchah
 20 granted. (22-CV-494 ECF No. 49). Following consolidation, this Court extended the close
 21 of discovery to January 31, 2023, and set March 2, 2023 as the deadline for dispositive
 22 motions, and April 2, 2023 (or 30 days after the final dispositive motion is rule on,
 23 whichever is later) as the deadline for the Proposed Joint Pretrial Order. (Doc. 51).
 24 Following this extension, the parties jointly moved the Court for another extension, which
 25 was granted by the Court, setting May 1, 2023 as the deadline for dispositive motions, and
 June 1, 2023 (or 30 days after the final dispositive motion is rule on, whichever is later) as
 the deadline for the Proposed Joint Pretrial Order. (Doc. 64).

26 It is respectfully submitted that the rulings on the Motions will affect the dispositive
 27 motions in this matter and thus, for efficiency's sake, briefing should not occur until the
 28 rulings are made. The continuance requested herein is not sought for the purposes of delay

1 and will not result in prejudice to the Parties or the Court. Accordingly, the Parties jointly
 2 request that the Court continue all deadlines in accordance with the below schedule:

<u>Deadline</u>	<u>Current Date</u>	<u>Proposed New Date</u>
4 Dispositive Motions	5 May 1, 2023	6 June 2, 2023 (or 30 days 7 after the last ruling on the 8 Motions, whichever is 9 later).
7 Pretrial Order	8 June 1, 2023	9 June 30, 2023 (or 30 days 10 after the final dispositive 11 motion is ruled on, 12 whichever is later).

10 **IT IS SO STIPULATED.**

12 Dated: April 10, 2023

13 **WILEY PETERSEN**

14 By: 

15 **Jonathan D. Blum, Esq.**
16 Nevada Bar No. 9515

17 **SCHLAM STONE & DOLAN LLP**

18 By: */s/ Samuel L. Butt*

19 **Samuel L. Butt**
(admitted pro hac vice)
20 **Joshua D. Wurtzel**
(admitted pro hac vice)

21 *Attorneys for the Suprock Parties*

12 Dated: April 10, 2023

13 **FENNEMORE CRAIG, P.C.**

14 By: */s/ Christopher H. Byrd*

15 **Christopher H. Byrd, Esq.**
16 Nevada Bar No. 1633
17 **Chelsie A. Adams, Esq.**
18 Nevada Bar No. 13058

17 **FENNEMORE CRAIG, P.C.**

20 By: */s/ David A. Timchak*

21 **David A. Timchak, Esq.**
(admitted pro hac vice)

22 *Attorneys for Quantum Energy, Inc.*

23 **ORDER**

24 **IT IS SO ORDERED.**

25 
26 **UNITED STATES MAGISTRATE JUDGE**
27 **DATED: April 12, 2023**